CAFO FACILITY INSPECTION REPORT

OFFICE NO: PCA SYSTEM TASK NO:

INSPECTOR(S): Jared Richardson (PG Environmental, LLC) and Anthony D'Angelo (PG Environmental, LLC)

FACILITY INFORMATION

8365940001 WDID NUMBER	**Rodger Camping** OWNER NAME	**Eagle Livestock** FACILITY NAME
CAG018001 NPDES NUMBER	**Ex. 6 Personal Privacy (PP)** OWNER ADDRESS	FACILITY ADDRESS
R8-2007-0001 RWQCB ORDER NO.	**Chino, CA 91710** OWNER CITY AND STATE	**Ontario, CA 91762** FACILITY CITY AND STATE
03/05/2013 SCHEDULED INSPECTION DATE	**Rodger Camping** OWNER CONTACT	**Kyle Fulmer** FACILITY CONTACT
03/05/2013 ACTUAL INSPECTION DATE	**Ex. 6 Personal Privacy (PP)** OWNER PHONE NO.	FACILITY PHONE NO.
Unknown RECEIVING WATER	**Ex. 6 Personal Privacy (PP)**	

INSPECTION TYPE

- ☐ (A1) "A" type compliance -- (EPA Type S)
- ☒ (B1) "B" type compliance -- (EPA Type C)
- ☐ (02) Noncompliance follow-up - Correction of a previously identified violation
- ☐ (03) Enforcement follow-up - Enforcement action is being met
- ☐ (04) Complaint - Complaint
- ☐ (05) Pre-requirement
- ☐ (06) Miscellaneous

_____ (Type) NOTE: If this is an EPA inspection not mentioned above, please note type (e.g., biomonitoring, performance audit, diagnostic, etc.)

No	Was the inspection pre-announced?
Yes	Were potential violations noted during this inspection?
No	Was this a quality assurance-based inspection?
No	Were bioassay samples collected?
No	Were water quality samples collected?

INSPECTION SUMMARY

The overall Facility rating, on a 1 (Unreliable) to 5 (Very Reliable) scale, was determined to be: 2 = Marginal.

Eagle Livestock (hereinafter, Facility) was rated "Marginal" due to the following items:

- **Depth markers were not installed in the existing east wastewater pond, or in the other six (6) catch basins identified onsite during the inspection (refer to Photos 2, 3, and 4)**
- **Annual Reports for the previous five (5) years were not retained or available for review at the time of the inspection**
- **Weekly Storm Water Management Structure visual inspection documentation was not retained onsite or available for review at the time of the inspection**
- **Manure Tracking Manifests were not retained onsite or available for review at the time of the inspection**
- **The Engineered Waste Management Plan (EWMP) was not retained onsite or available for review at the time of the inspection**
- **The EWMP was not reflective of current Facility conditions at the time of the inspection**
- **The on-site containment structures are not cleaned annually as required by the EWMP**

- Secondary containment was not provided for 55-gallons drums of bleach and oxidizer on the west side of the calf milk production area (refer to Photo 13). In addition, a bung cap was missing from a 55-gallon drum of unknown fluid (refer to Photo 13 and 14)
- Fuel staining on the impervious surface from the Facility fueling area was observed in the central portion of the Facility (refer to Photo 15)
- Vegetation growth was observed in the existing west process wastewater pond at the Facility (refer to Photos 16 and 17)
- Solids accumulation was observed in the southeastern catch basin (refer to Photo 3)
- Unconsolidated soil stockpiles were observed along the southern embankment slope of the existing west process wastewater pond (refer to Photos 16 and 18). The overflow spillway in the existing west process wastewater pond was observed to be obstructed by multiple unconsolidated soil stockpiles (refer to Photo 18)
- A gap was observed in the eastern embankent slope of the southeastern catch basin (refer to Photo 19)

INSPECTOR DATA

INITIALS AJD/JCR SIGNATURE _____ DATE 03/05/2013

CIWQS DATA ENTRY DATE: _____ REGIONAL BOARD FILE NUMBER: _____

FOR INTERNAL USE: REVIEWED BY: (1)_____ (2) _____ (3) _____

REPORT PREPARED BY: Anthony D'Angelo (PG Environmental, LLC) ON 03/13/2013

EPA SUGGESTED INSPECTION CHECKLIST

☒ Permit	☐ Flow Measurement	☐ Pretreatment	☒ Operations & Maintenance
☒ Records/Reports	☐ Laboratories	☐ Compliance Schedules	☐ Sludge Disposal
☒ Facility Site Review	☐ Eff/Receiving Waters	☐ Self- Monitoring	☐ Other

POTENTIAL VIOLATIONS

1. Depth markers were not installed in the existing east process wastewater pond, or in the other six (6) catch basins identified onsite during the inspection, as required by Permit Attachment B - Monitoring and Reporting Program, Section I.B.1 (refer to Photos 2, 3, and 4). This is a recurring issue identified in a previous inspection conducted on December 22, 2010.

Description of Potential Violation: **Refer to Item No. 1 of the 'Inspection Observations' section of this report for additional details.**

2. The EWMP was not retained onsite or available for review at the time of the inspection as required by Provision VII.C.3.c of the Permit.

Description of Potential Violation: **Refer to Item No. 1 of the 'Engineered Waste Management Plan Review' section of this report for additional details.**

3. The EWMP was not reflective of current Facility conditions (i.e., catch basins and process wastewater generation) nor had the EWMP been fully implemented at the time of the inspection, as required by Provision VII.C.3.b of the Permit (refer to Photos 3 through 11, and 19).

Description of Potential Violation: **Refer to Item Nos. 2, 3, and 4 of the 'Engineered Waste Management Plan Review' sections of this report for additional details.**

4. Vegetation growth, solids accumulation, and unconsolidated/unmaintained containment structure berms were observed in the existing west process wastewater pond and in the southeastern catch basin at the Facility (refer to Photos 3 and 16 through 19). The Discharger must design and maintain all containment structures per the EWMP as required by Provisions VII.C.3.a-b of the Permit.

Description of Potential Violation: **Refer to Items No. 3 through 6 of the 'Facility Housekeeping, Wastewater, and Manure Information' section of this report for additional details.**

Date of Potential Violation: **N/A**

Date of Potential Violation Determination: **03/05/2013**

INSPECTION OBSERVATIONS

On March 5, 2013, a Concentrated Animal Feeding Operation (CAFO) inspection was conducted for Santa Ana Water Board Order No. R8-2007-0001 - 'General Waste Discharge Requirements for Concentrated Animal Feeding Operations (Dairies and Related Facilities) within the Santa Ana Region', NPDES General Permit No. (CAG018001) at Eagle Livestock in Ontario, California (refer to Photo 1). The inspectors provided a phone call and left a voicemail for Mr. Rodger Camping (Owner, Eagle Livestock) at approximately 5:35 PM on March 4, 2013. The inspectors met with Mr. Kyle Fulmer (Dairyman, Eagle Livestock) at approximately 8:15 AM on March 5, 2013. Mr. Fulmer informed the inspectors that Mr. Camping was not available at the time of the inspection and accompanied the inspectors in the Facility site visit. Records were not available for review at the time of the inspection. The inspectors held a closing conference with Mr. Fulmer at the conclusion of the inspection. During the closing conference, the inspectors reviewed the preliminary inspection findings with the Facility representative.

The Facility is a 46.6-acre calf ranch with an animal population of approximately 4,000 calves at the time of the inspection. Milking and cow washing activities do not occur at the Facility; however, process wastewater is generated in the central east portion of the Facility during calf milk production activities (refer to Photo 5). Process wastewater generated during this activity flows into an adjacent drain and is gravity-fed via an underground pipe to the south where it flows out of an outlet structure and along a surface ditch into either the catch basins identified during the inspection or the existing process wastewater ponds in the southern portion of the Facility (refer to Photos 6 through 12). It should be noted that the EWMP does not identify any process wastewater generated from milk production activities, or identify process wastewater distribution equipment/structures on the Site Plan. Surface runoff from all corrals and hutches naturally flows south into the catch basins and existing process wastewater ponds in the southern portion of the Facility. The existing east process wastewater pond and five (5) of the six (6) catch basins identified during the inspection were observed containing process wastewater (refer to Photos 2, 4, 10, and 12). It should be noted that depth markers were not present in any basins or ponds containing wastewater; therefore, the inspectors were unable to verify the depth of water in each containment structure (refer to Photos 2, 3, and 4). The existing west process wastewater pond and the southeastern catch basin were dry at the time of the inspection (refer to Photos 3 and 16 through 19). The existing west process wastewater pond was equipped with a concrete spillway on the southern embankment slope of the pond; however, unconsolidated soil stockpiles were observed blocking the spillway structure (refer to Photo 18). Mr. Fulmer stated that he had never observed the ponds and basins being cleaned within the past six (6) years. The southwest catch basin appeared to contain the most process wastewater, and had approximately three (3) feet of freeboard (refer to Photo 4).

Mr. Fulmer stated that the corrals are cleaned/scraped three (3) times per year and manure is typically hauled away immediately from the Facility following the cleaning/scraping event. A manure stockpile was not observed onsite at the time of the inspection. Manure is hauled offsite by Ontario Transport; however Mr. Fulmer did not know the destination or if manure tracking manifests were maintained of all haul events. In addition, Mr. Fulmer stated that all berms are inspected and repaired annually. All mortalities are removed from the Facility immediately by Stiles Animal Removal, Inc.

FACILITY

CAFO Size: **Large**	Total Acres: **46.6**	Production Area Acres: **Approx. 35**
(at time of inspection)		

CONTAINMENT STRUCTURES

Wastewater Lagoons: **2**	Evaporation Ponds: **0**	Catch Basins: **6**
Depth Markers: **1**	Other: **N/A**	

ANIMALS ONSITE DURING INSPECTION

Milk Cows: **0**

Dry Cows: **0**

Heifers: **0**

Calves: **Approx. 4,000**

Other: **Approx. 6 llamas, 18 sheep, 1 goat, 14 pigs, 20 chickens**

INSPECTION OBSERVATIONS

1. The inspectors observed, during the inspection, that depth markers were not installed in the existing east process wastewater pond, or in the other six (6) catch basins identified onsite during the inspection as required by Permit Attachment B - Monitoring and Reporting Program, Section I.B.1 (refer to Photos 2, 3, and 4). A depth marker was present in the existing west process wastewater pond located in the southwest corner of the Facility (refer to Photos 16, 17, and 18). Process wastewater was present in the existing east wastewater pond, as well as in five (5) of the six (6) catch basins identified onsite during the inspection; however, the inspectors could not verify the depth of the process wastewater in each containment structure due to the lack of depth markers. This is a reccuring issue identified in a previous inspection conducted on December 22, 2010.

ANNUAL REPORT REVIEW

ANNUAL REPORT

Monitoring Year: **N/A**

Reviewed: **No**

Signed & Certified: **Unknown**

Submittal Date: **N/A**

REPORTED ANIMAL POPULATION

Milk Cows: **N/A**

Dry Cows: **N/A**

Heifers: **N/A**

Calves: **N/A**

Other: **N/A**

MANURE INFORMATION

Amount of manure spread on cropland at the Facility: **None**

Amount of manure hauled away from the Facility: **N/A**

Name and location of the composting operation, or, if the manure was hauled to cropland, the owner or tenant, and the destination address: **Unknown by primary on-site Facility representative**

1. Annual Reports for the previous five (5) years were not available for review at the time of inspection. All monitoring data shall be maintained for at least five (5) years and shall be made available upon request as required by Permit Attachment B - Monitoring and Reporting Program, Section I.A.

2. Weekly Storm Water Management Structure visual inspection documentation was not retained onsite or available for review at the time of the inspection.; therefore, the inspectors were unable to determine if weekly inspections were being conducted. Permit Attachment B - Monitoring and Reporting Program, Section I.B states "All containment structures, including but not limited to, ponds, berms, and wastewater distribution lines, shall be inspected at least once a week during the entire year and at least once each 24-hour period during a storm event in which rainfall exceeds 0.5 inches in 24 hours. The findings of these inspections shall be documented on the at attached CAFO Weekly Storm Water Management Structure Inspections Log Sheet (Attachment 1[of the Permit])."

ENGINEERED WASTE MANAGEMENT PLAN (EWMP) REVIEW

Did the inspector review the EWMP in the RWQCB file?	**Yes**
Did the Facility have a copy of the EWMP on-site and available for review?	**No**
EWMP preparation date:	**March 3, 2007**
EWMP prepared by:	**Madison Engineering**
Santa Ana RWQCB EWMP acceptance date:	**Unknown**
EWMP was certified by the Facility's engineer/consultant on:	**Unknown**

1. The EWMP was not retained onsite or available for review at the time of the inspection as required by the Permit. Mr. Fulmer stated that he was unsure where the Facility EWMP was retained. Provision VII.C.3.c of the Permit states that "a copy of the accepted Engineered Waste Management Plan (EWMP) for the facility shall be maintained on site and the person in charge of the dairy operation shall be familiar with its content."

2. The EWMP was not reflective of current Facility conditions or fully implemented onsite at the time of the inspection as required by the Permit. The 'Operation and Maintenance' section of the EWMP states "this heifer farm will have two waste water ponds. The water level will be kept to a minimum." The inspectors observed both existing wastewater ponds, as well as six (6) additional catch basins, located upgradient of the exisiting ponds for a total of eight (8) containment structures at the Facility, which is more than the two (2) identified in the approved EWMP (refer to Photos 2, 3, 4, 10, 12 and 16 through 19). In addition, the existing east process wastewater pond as well as all catch basins did not contain depth markers (refer to Photos 2, 3, and 4). Furth more, process wastewater was observed in the existing east process wastewater pond as well as in five (5) of the six (6) catch basins (refer to Photos 2, 4, 10, and 12). As a result, the Discharger had not fully implemented or amended the approved EWMP to include the six (6) additional catch basins observed onsite. Provision VII.C.3.b of the Permit states that "the discharger shall develop and fully implement an Engineered Waste Management Plan (EWMP) acceptable to the Executive Officer." The Discharger shall fully implement the EWMP as required by Provision VII.C.3.b of the Permit.

3. The EWMP was not reflective of current Facility conditions at the time of the inspection as required by the Permit. The 'Existing Waste Management System' section of the EWMP states "there is no wash water generated at this site." The inspectors observed bottle washing activities occuring at the calf milk production area in the central-east portion of the Facility (refer to Photos 5 and 6). Wash water (i.e., process wastewater) was observed actively flowing out of a valve head in the central portion of the site, and flowing via a surface conveyance ditch to the existing east process wastewater pond (refer to Photos 7 through 12). The EWMP does not identify bottle rinsing activities as a source of process wastewater for the Facility. As a result, the EWMP was not representative of current Facility conditions at the time of the inspection. Provision VII.C.3.b of the Permit states that "the discharger shall develop and fully implement an Engineered Waste Management Plan (EWMP) acceptable to the Executive Officer." The Discharger shall fully implement the EWMP as required by Provision VII.C.3.b of the Permit.

4. The EWMP was not fully implemented onsite at the time of the inspection as required by the Permit. The 'Operation and Maintenance' section of the EWMP states "the pond[s] will be drained each year and if manure covers the bottom, it will be removed." Mr. Fulmer stated that he had never observed the ponds and basins being cleaned within the past six (6) years and that he was unaware of any cleaning frequency timeframe for the containment structures. As a result, the Discharger had not fully implemented the approved EWMP. Provision VII.C.3.b of the Permit states that "the discharger shall develop and fully implement an Engineered Waste Management Plan (EWMP) acceptable to the Executive Officer." The Discharger shall fully implement the EWMP as required by Provision VII.C.3.b of the Permit.

NUTRIENT MANAGEMENT PLAN (NMP) REVIEW (IF APPLICABLE)

Did the Facility have a copy of the NMP on-site and available for review?	**N/A**
Date NMP was prepared:	**N/A**
NMP prepared by:	**N/A**
Santa Ana RWQCB NMP acceptance date:	**N/A**

1. The Discharger does not apply manure, litter, or process wastewater to croplands under their ownership or operational control; therefore, the Discharger is not required to develop, implement, and retain onsite a Nutrient Management Plan as stated in Provision VII.C.3.d of the Permit.

FACILITY HOUSEKEEPING, WASTEWATER, AND MANURE INFORMATION

Typical Depth of Manure in Corrals (in inches):	**1-4**
Estimated Freeboard in Fullest Lagoon (in feet):	**3**
Date of Last Lagoon Solids Removal, per Facility Representative:	**Unknown**
Disposal Location for Lagoon Solids:	**Unknown**

REVIEW OF FACILITY HOUSEKEEPING

1. The inspectors observed, during the inspection, that secondary containment was not provided for multiple 55-gallons drums of bleach and an unknown oxidizing fluid on the west side of the calf milk production area (refer to Photo 13). In addition, a bung cap was not in place for one (1) of the 55-gallon drums identified above (refer to Photo 14). Provision VII.C.5.h of the Permit states that "chemicals and other contaminants handled on-site shall not be disposed of in any manure, littler, process wastewater, or storm water storage or treatment systems." The inspectors did not observe a disposal of chemical into any of the areas outlined above; however, the lack of secondary containment creates a potential for chemicals to be spilled and/or released into adjacent corrals or the catch basins.

2. The inspectors observed, during the inspection, fuel staining from the Facility fueling area on the impervious surface underneath the fuel tanks in the central portion of the Facility (refer to Photo 15). Provision VII.C.5.h of the Permit states that "chemicals and other contaminants handled on-site shall not be disposed of in any manure, littler, process wastewater, or storm water storage or treatment systems." The inspectors did not observe a disposal of fuel into any of the areas outlined above; however, the fuel staining on the ground surface creates a potential for fuel to contribute pollutants to storm water runoff, which is collected by the Facility containment structures in the southern portion of the Facility.

CONDITION OF BERMS AND CONTAINMENT STRUCTURES

3. The inspectors observed, during the inspection, vegetation growth potentially affecting the containment structure capacity in the existing west process wastewater pond (refer to Photos 16 and 17). The 'Operation and Maintenance' section of the EWMP states that "excessive vegetation growth around containment structures will be contolled with mowing." Weed abatement is performed by Mr. Fulmer periodically; however, vegetation growth was observed inside the pond at the time of the inspection. As a result, the overall capacity of the existing west process wastewater pond at the Facility may be diminished. Provision VII.C.3.a of the Permit states that "the discharger shall design, construct, and maintain containment structures to retain all wastewater within the facility, including all process wastewater and all precipitation on, and drainage through, manured areas resulting

from rainfall up to and including a 25-year, 24-hour rainfall event." The Discharger must design and maintain all containment structures per the EWMP as required by Provisions VII.C.3.a-b of the Permit.

4. The inspectors observed, during the inspection, solids accumulation in the southeastern catch basin in the southeast corner of the Facility (refer to Photo 3). The catch basin did not contain a depth marker; therefore, the inspectors were unable to determine the depth of accumulated solids in the basin. Mr. Fulmer stated that he was unaware of a cleaning frequency for the containment structures onsite, or if they had ever been cleaned. The 'Operation and Maintenance' section of the EWMP states that "the pond[s] will be drained each year and if manure covers the bottom, it will be removed." Provision VII.C.3.a of the Permit states that "the discharger shall design, construct, and maintain containment structures to retain all wastewater within the facility, including all process wastewater and all precipitation on, and drainage through, manured areas resulting from rainfall up to and including a 25-year, 24-hour rainfall event." The Discharger must design and maintain all containment structures per the EWMP as required by Provision VII.C.3.a of the Permit.

5. The inspectors observed, during the inspection, unconsolidated soil stockpiles along the southern and eastern embankment slopes of the existing west process wastewater pond (refer to Photos 16 and 18). The overflow spillway on the south central side of the existing west process wastewater pond was observed obstructed by multiple unconsolidated soil stockpiles (refer to Photo 18). The 'Proposed Waste Management Plan' section of the EWMP states that "an emergency spillway has been added along the west berm to allow a 100-year, 24-hour storm (52.2 CFS) to flow through at a velocity less than 5.0 feet per second. At this velocity, erosion will not be a concern." As a result of the unconsolidated soil stockpiles location, flow discharging out of the existing west process wastewater pond emergency spillway would be obstructed. In addition, the EWMP states that the emergency spillway is present on the west berm; however, the inspectors observed the spillway had been constructed on the south berm (refer to Photo 18). Provision VII.C.3.a of the Permit states that "the discharger shall design, construct, and maintain containment structures to retain all wastewater within the facility, including all process wastewater and all precipitation on, and drainage through, manured areas resulting from rainfall up to and including a 25-year, 24-hour rainfall event." The Discharger must design and maintain all containment structures per the EWMP as required by Provision VII.C.3.a of the Permit.

6. The inspectors observed, during the inspection, a gap in the containment berm on the east side of the southeastern catch basin (refer to Photo 19). An overflow out of the basin through the gap has the potential to discharge offsite and onto the adjacent dairy, Basque-American No. 1. It should be noted that this catch basin is not identified in the Facility's approved EWMP. Effluent Limitations and Discharge Specifications V.A.1.a specifies that production areas (e.g., waste confinement areas) must be designed to maintain all process water including the runoff and the direct precipitation from a 25-year, 24-hour rainfall event. It should be noted that an issue with Facility containment structure berm maintenance was noted during a previous inspection conducted on December 22, 2012. Provision VII.C.3.a of the Permit states that "the discharger shall design, construct, and maintain containment structures to retain all wastewater within the facility, including all process wastewater and all precipitation on, and drainage through, manured areas resulting from rainfall up to and including a 25-year, 24-hour rainfall event." The Discharger must design and maintain all containment structures per the EWMP as required by Provision VII.C.3.a of the Permit.

ITEMS FOR FOLLOW UP ON FUTURE INSPECTIONS

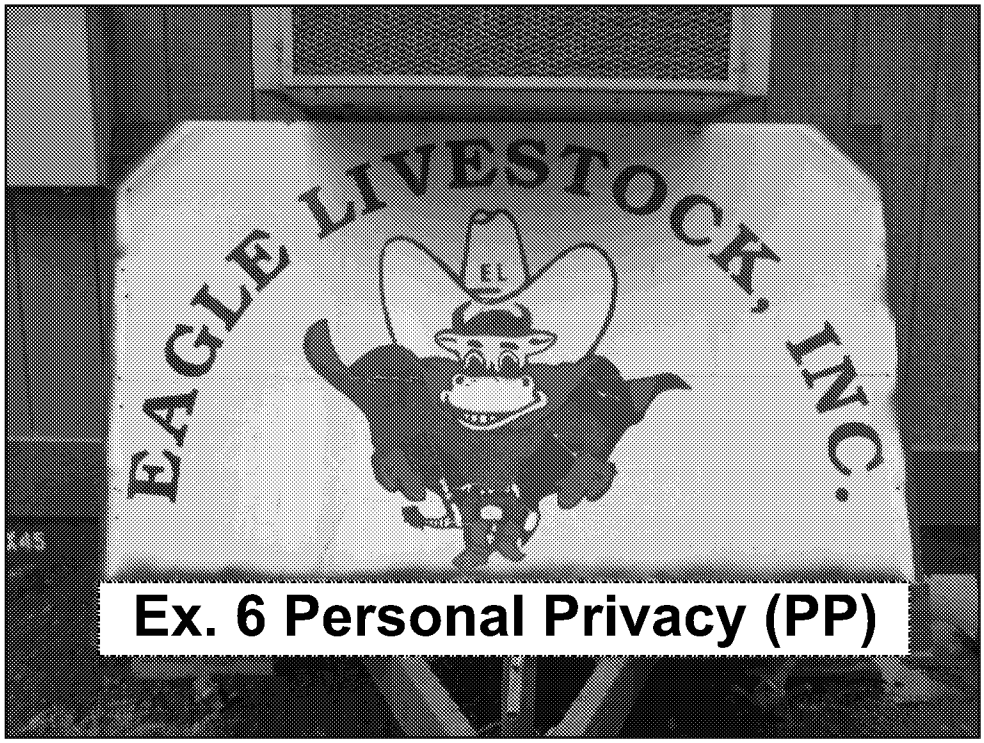
1. Verify that the approved EWMP is reflective of current Facility conditions (e.g., catch basins)

2. Verity that Weekly Storm Water Management Structure visual inspections are being adequately conducted and documented

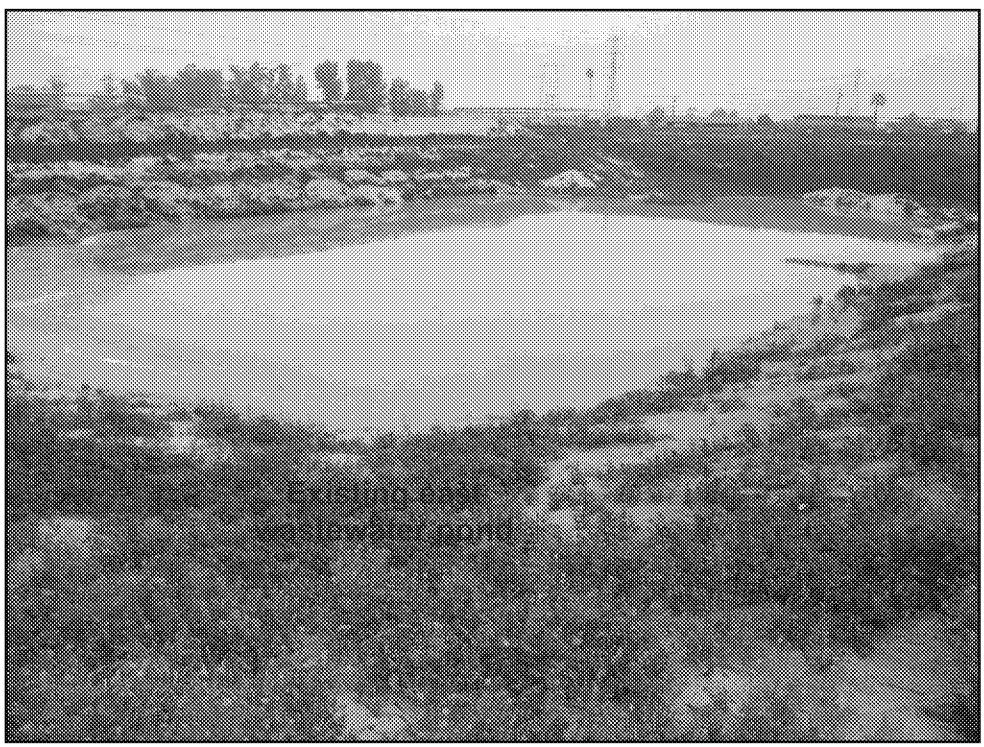
3. Verify that Manure Tracking Manifests are documented and retained

4. Ensure that Facility containment structures and berms are adequately maintained

5. Verity that depth markers are installed in all process wastewater catch basins and ponds



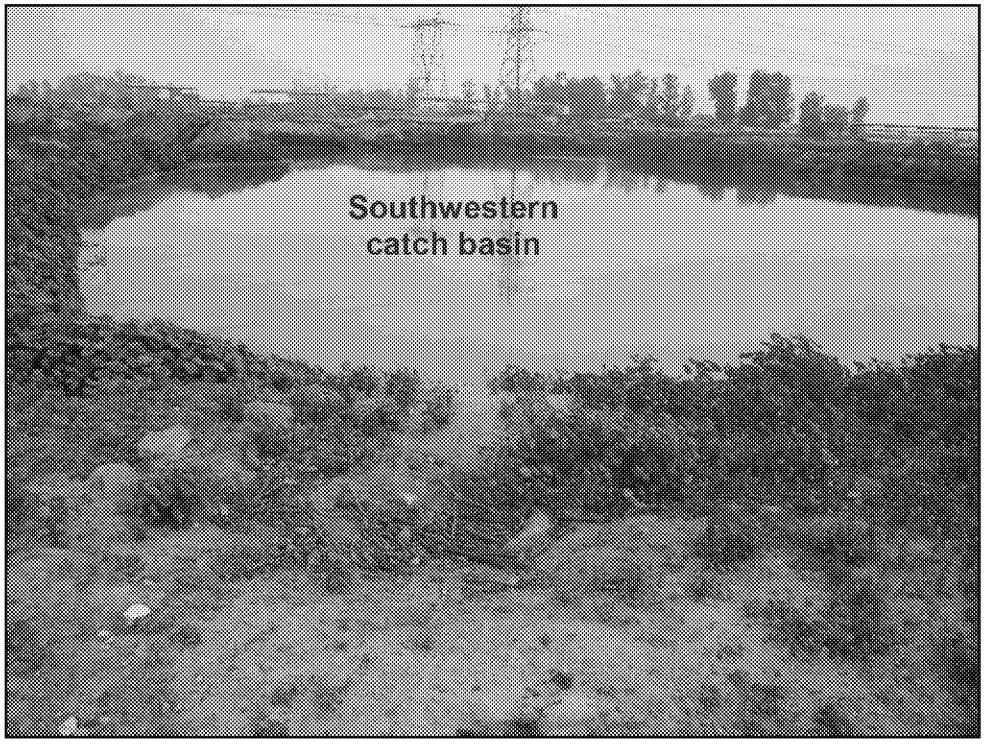
Photograph 1. Eagle Livestock Facility sign.



Photograph 2. View facing northeast of the existing east process wastewater pond located in the southeast corner of the Facility. Note process wastewater was observed actively flowing into the northwest corner of the pond. Also note the pond did not contain a depth marker.

Inspection and Photograph Date: March 5, 2013

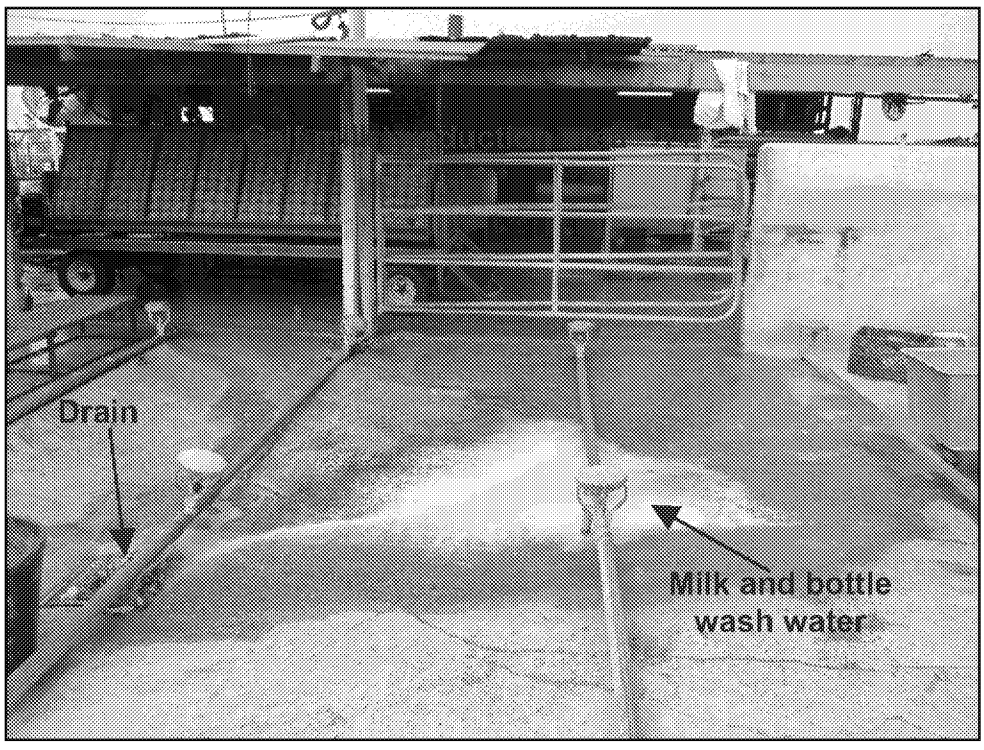
Photograph 3. View facing west of the dry southeastern catch basin, located immediately north of the existing east process wastewater pond. Note the basin did not contain a depth marker. Also note the solids accumulation within the basin.



Photograph 4. View facing north of the southwestern catch basin, located immediately north of the existing west process wastewater pond. Note the basin did not contain a depth marker.

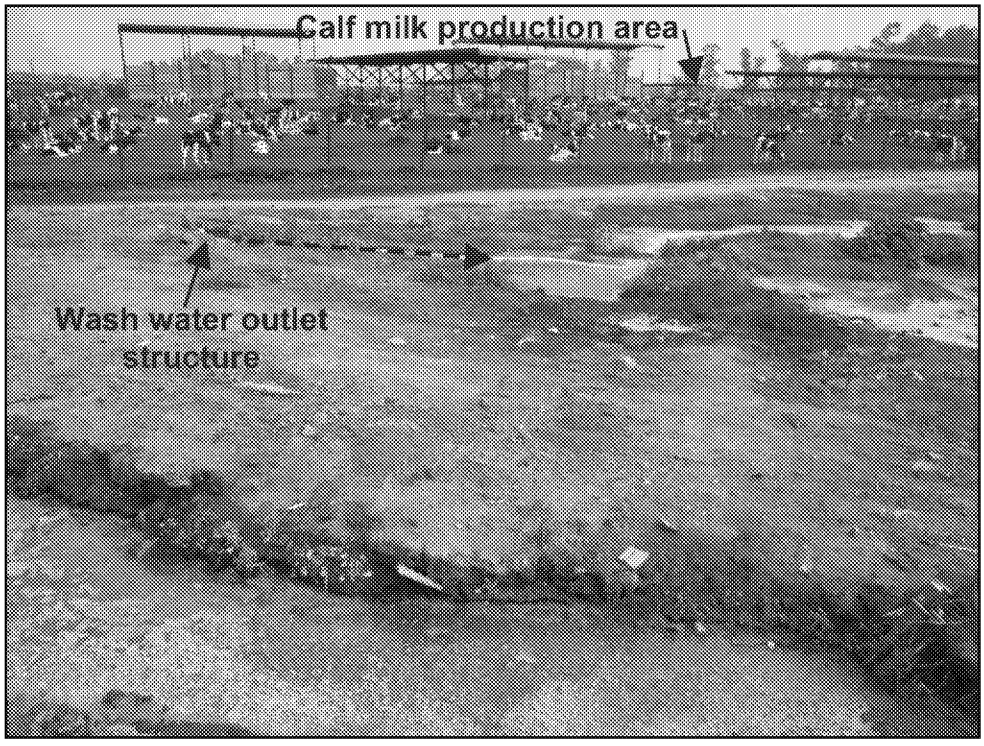
Inspection and Photograph Date: March 5, 2013

Photograph 5. Close-up view of bottle washing activities at the calf milk production area in the central-east portion of the Facility. Note the approved EWMP states that no wash water (i.e., process wastewater) is produced at the Facility.



Photograph 6. View facing west of wash water entering an existing drain located in the inactive wash pen. This wash water (i.e., process wastewater) is piped south to the basins and ponds.

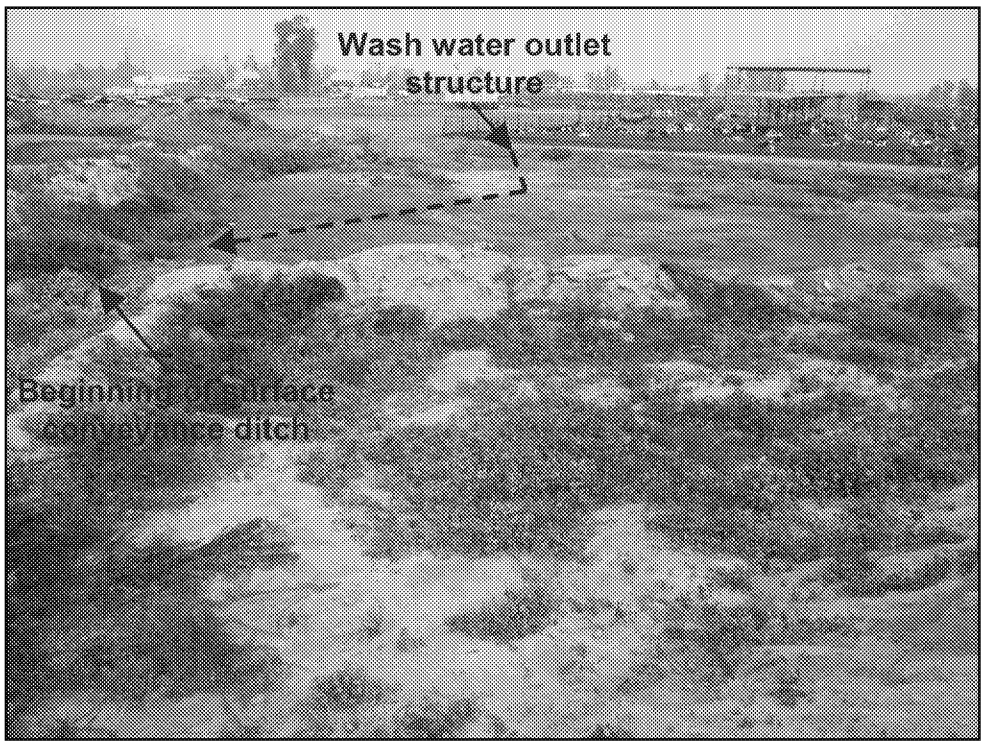
Inspection and Photograph Date: March 5, 2013



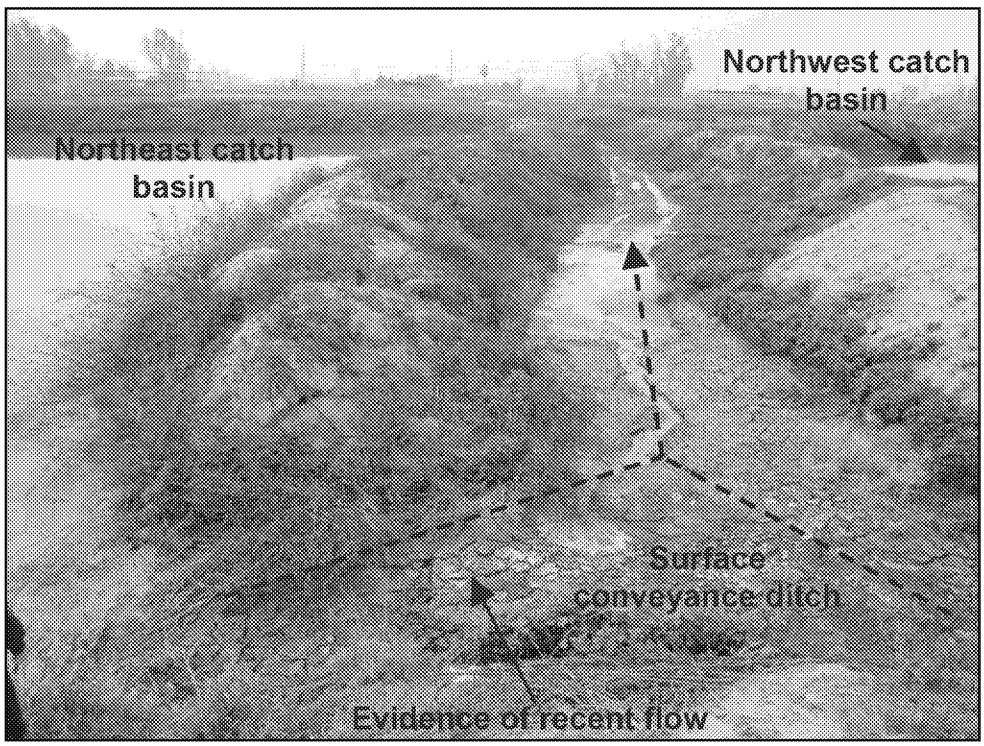
Photograph 7. View facing north of the wash water (shown in Photograph 6) outlet structure located in the central portion of the Facility, downgradient of the southern corrals.

Photograph 8. View facing south of the wash water outlet structure and flow pathway. Wash water flows through a dirt area and into a surface conveyance ditch that runs north/south between the catch basins. Wash water was actively flowing into the basins at the time of the inspection.

Inspection and Photograph Date: March 5, 2013



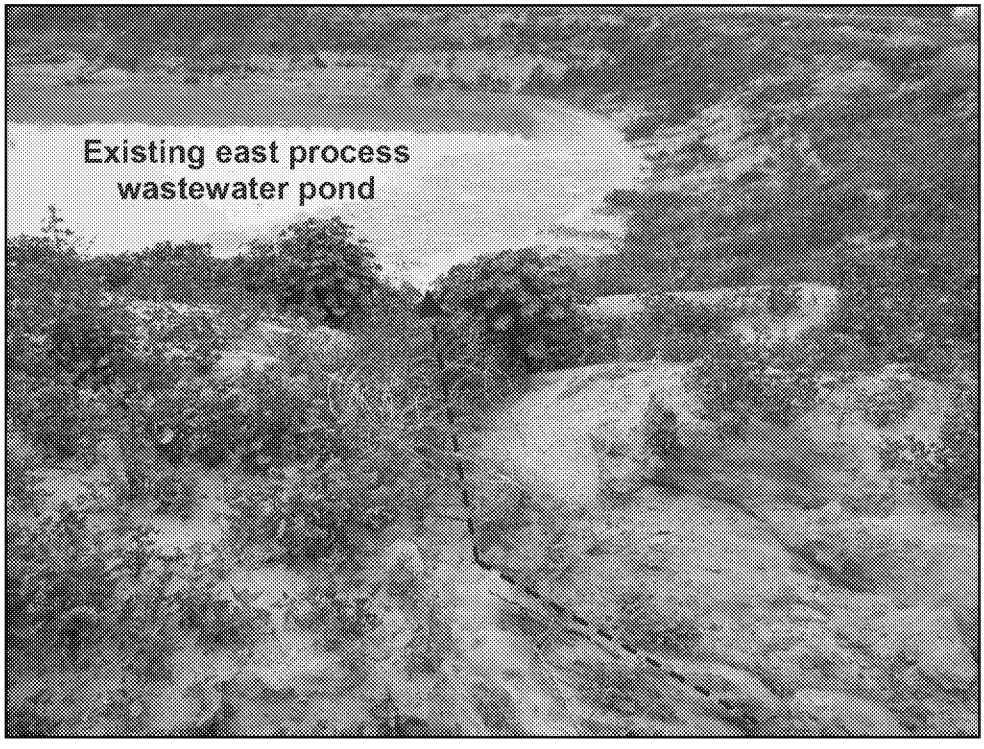
Photograph 9. View facing northwest of the wash water outlet structure shown in Photographs 7 and 8, and the flow pathway into the north/south running surface conveyance ditch.



Photograph 10. View facing south of the surface ditch conveying wash water south between the catch basins. Note evidence of recent flow from the northeast catch basin into the surface conveyance ditch was observed.

Inspection and Photograph Date: March 5, 2013

Photograph 11. View facing north of the surface ditch conveying wash water south between the catch basins. Note this process wastewater was observed entering the existing east process wastewater pond in the southeast corner of the Facility, shown in Photograph 12.



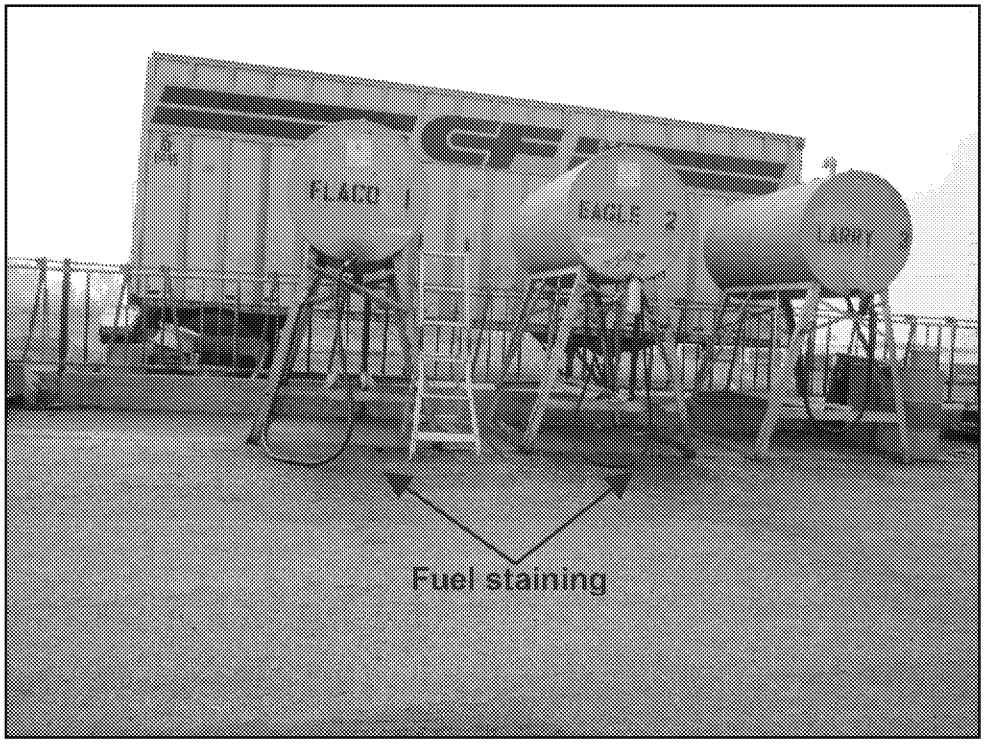
Photograph 12. View facing south of wash water actively flowing into the northwest corner of the existing east process wastewater pond.

Inspection and Photograph Date: March 5, 2013

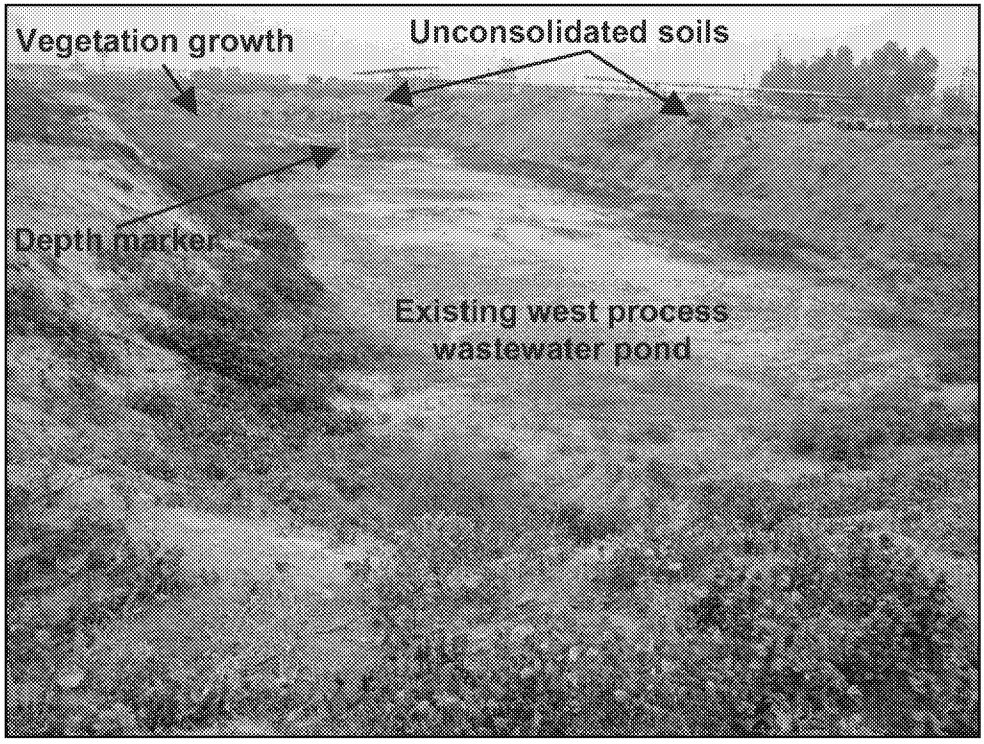
Photograph 13. Close-up view of 55-gallon drums of an unknown oxidizing fluid without secondary containment located on the west side of the calf milk production area shown in Photographs 5, 6, and 7.

Photograph 14. Close-up view of a missing bung cap on one of the 55-gallon drums of an unknown oxidizing fluid shown in Photograph 13.

Inspection and Photograph Date: March 5, 2013

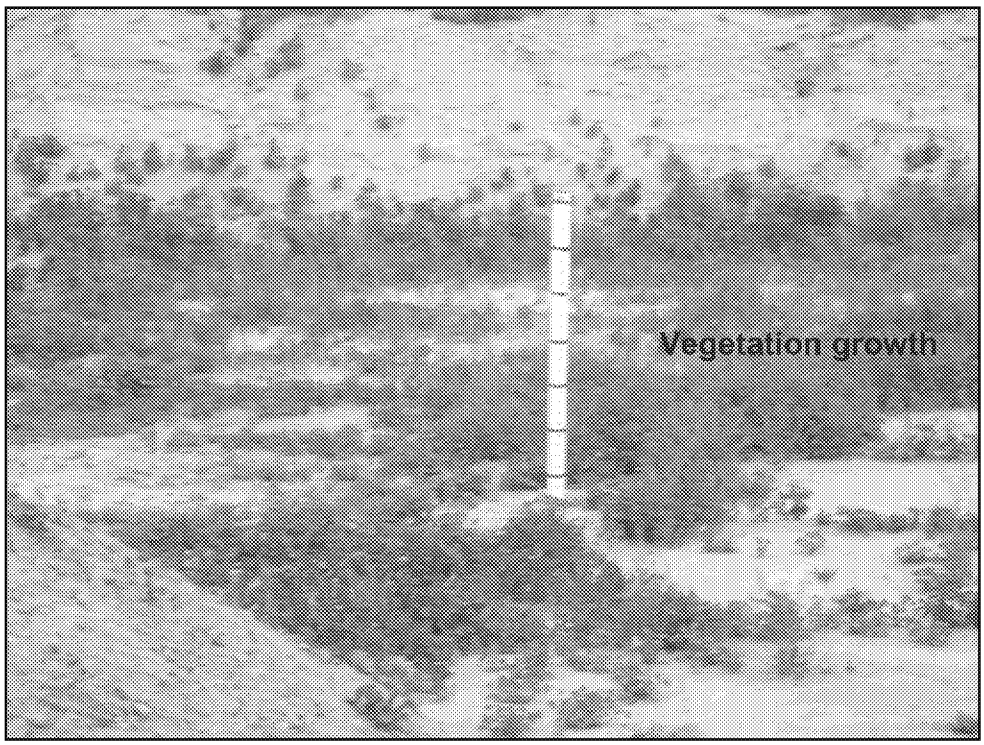


Photograph 15. View facing south of fuel staining on the impervious surface underneath the fuel storage tanks located in the central portion of the Facility.

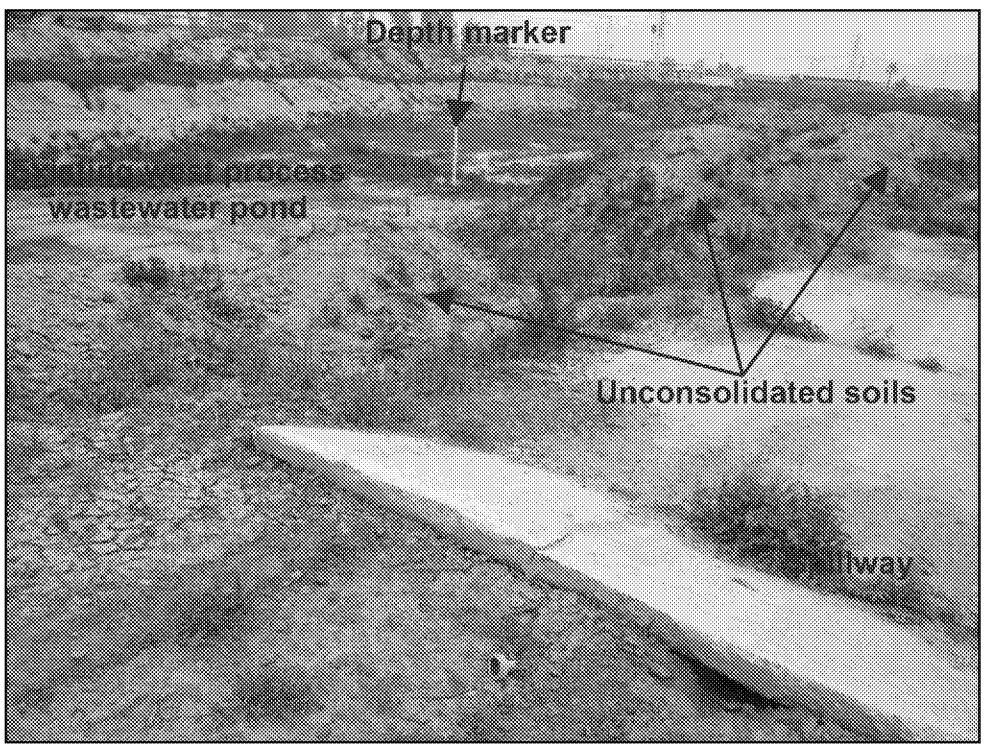


Photograph 16. View facing southeast of the existing west process wastewater pond located in the southern portion of the Facility. Note vegetation growth was observed inside the pond and unconsolidated soils were observed on the embankment slopes of the pond. This pond did contain a depth marker.

Inspection and Photograph Date: March 5, 2013

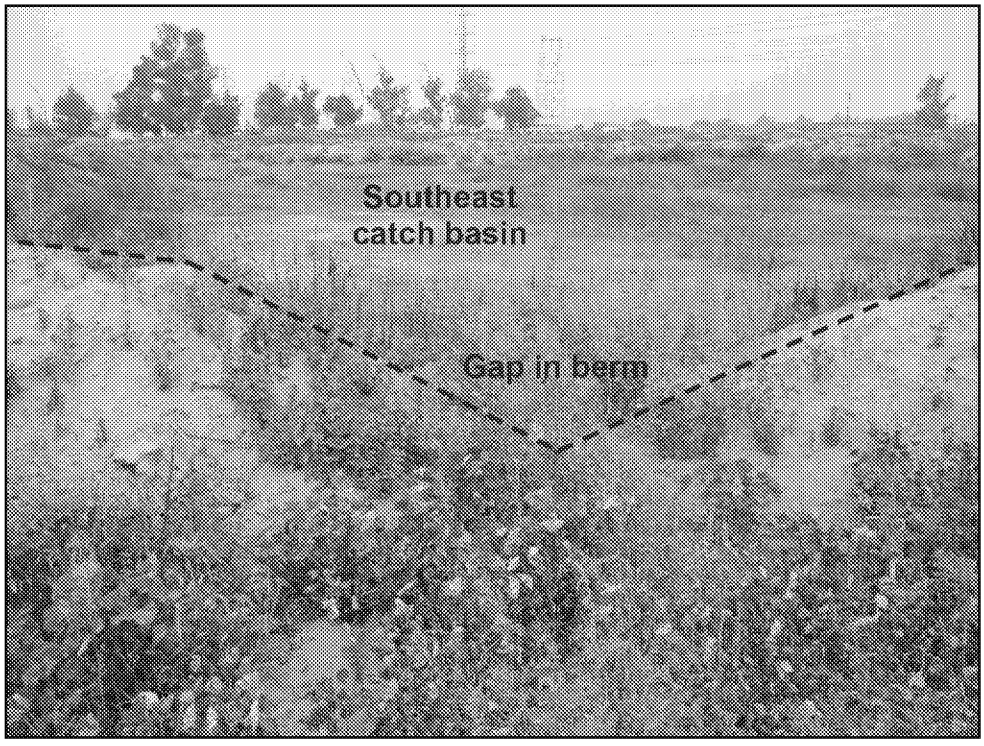


Photograph 17. Close-up view of the depth marker and vegetation growth in the existing west process wastewater pond, shown in Photograph 16.



Photograph 18. View facing northeast of unconsolidated soil stockpiles located on the southern and eastern embankment slopes of the existing west process wastewater pond. Note a soil stockpile was obstructing the emergency spillway located on the south side of the pond.

Inspection and Photograph Date: March 5, 2013



Photograph 19. View facing west of a gap in the eastern containment berm of the southeast catch basin, shown in Photograph 3.